

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X
GENE SAMIT, Individually and On Behalf of All	:
Others Similarly Situated,	:
	:
Plaintiff,	:
	:
vs.	:
	:
CBS CORPORATION, LESLIE MOONVES,	:
and JOSEPH R. IANNIELLO,	:
	:
Defendants.	:
	:
-----	X

No. 1:18-cv-7796-VEC

**STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR DEFENDANTS
TO ANSWER, MOVE, OR OTHERWISE RESPOND TO THE COMPLAINT**

WHEREAS, the Plaintiff filed a putative class action complaint (the “Complaint”) against CBS Corporation, Leslie Moonves, and Joseph R. Ianniello (collectively, the “Defendants”) on August 27, 2018;

WHEREAS, the Defendants agreed to waive service of a summons in this action, and waived any objections to the absence of a summons or of service, provided that the Defendants did not waive any defenses or objections to the lawsuit, the Court’s jurisdiction, or the venue of the action;

WHEREAS, there is a related action pending in the Southern District of New York, captioned *John Lantz v. CBS Corporation, et al.*, Case No. 1:18-cv-8978-VEC (S.D.N.Y.) (the “Related Action”);

WHEREAS, this case and the Related Action are governed by the Private Securities Litigation Reform Act (the “PSLRA”);

WHEREAS, pursuant to Federal Rules of Civil Procedure 4 and 12, the time for the Defendants to answer, move, or otherwise respond to the Complaint has not yet passed;

WHEREAS, this is the first application to extend the Defendants' time to answer, move, or otherwise respond to the Complaint;

NOW THEREFORE, the Plaintiff and the Defendants, through their undersigned counsel, hereby stipulate and agree, subject to the Court's approval, as follows:

1. The Defendants' time to answer, move, or otherwise respond to the Complaint is extended until after the Court appoints lead plaintiff and lead counsel for plaintiff, and lead plaintiff serves a consolidated amended complaint or designates a pending complaint as the operative complaint.

2. After the Court has appointed lead plaintiff and lead counsel for the putative Class, the parties shall meet and confer on an appropriate schedule for lead plaintiff to file a consolidated amended complaint or designate an operative complaint, and for the Defendants to move, answer or otherwise respond to such complaint.

3. Discovery and other proceedings are stayed pursuant to the Private Securities Litigation Reform Act, 15 U.S.C. § 77z-1(b)(1).

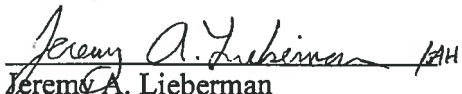
4. This Order shall apply to each case arising out of the same or similar transactions and/or events as the Complaint which is subsequently filed in, remanded to, or transferred to this Court.

5. Nothing herein shall constitute a waiver or abrogation of, or in any other manner prejudice, any defenses that might be raised by the Defendants.

6. This stipulation may be signed in counterparts, and the signature pages may be exchanged via PDF and email.

Dated: October 25, 2018
New York, New York

POMERANTZ LLP


Jeremy A. Lieberman
J. Alexander Hood II
600 Third Avenue, 20th Floor
New York, New York 10016
Telephone: (212) 661-1100
Email: jalieberman@pomlaw.com
ahood@pomlaw.com

Patrick V. Dahlstrom
10 South La Salle Street, Suite 3505
Chicago, Illinois 60603
Telephone: (312) 377-1181
Email: pdahlstrom@pomlaw.com

Attorneys for Plaintiff Gene Samit

WILLKIE FARR & GALLAGHER LLP

Mary Eaton
Alexander L. Cheney
Zeh S. Ekono
787 Seventh Avenue
New York, New York 10019
Telephone: (212) 728-8000
Email: meaton@willkie.com
acheney@willkie.com
zekono@willkie.com

*Attorneys for Defendants CBS Corporation
and Joseph R. Ianniello*

DECHERT LLP

Andrew J. Levander
Hector Gonzalez
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036
Telephone: (212) 698-3500
Email: andrew.levander@dechert.com
hector.gonzalez@dechert.com

Attorneys for Defendant Leslie Moonves

IT IS SO ORDERED:

The Honorable Valerie E. Caproni
United States District Judge

Dated: _____, 2018

POMERANTZ LLP

Jeremy A. Lieberman
J. Alexander Hood II
600 Third Avenue, 20th Floor
New York, New York 10016
Telephone: (212) 661-1100
Email: jalieberman@pomlaw.com
ahood@pomlaw.com

Patrick V. Dahlstrom
10 South La Salle Street, Suite 3505
Chicago, Illinois 60603
Telephone: (312) 377-1181
Email: pdahlstrom@pomlaw.com

Attorneys for Plaintiff Gene Samit

WILLKIE FARR & GALLAGHER LLP

M. Eaton

Mary Eaton
Alexander L. Cheney
Zeh S. Ekono
787 Seventh Avenue
New York, New York 10019
Telephone: (212) 728-8000
Email: meaton@willkie.com
acheney@willkie.com
zekono@willkie.com

*Attorneys for Defendants CBS Corporation
and Joseph R. Ianniello*

DECHERT LLP

Andrew J. Levander
Hector Gonzalez
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036
Telephone: (212) 698-3500
Email: andrew.levander@dechert.com
hector.gonzalez@dechert.com

Attorneys for Defendant Leslie Moonves

IT IS SO ORDERED:

The Honorable Valerie E. Caproni
United States District Judge

Dated: _____, 2018

POMERANTZ LLP

Jeremy A. Lieberman
J. Alexander Hood II
600 Third Avenue, 20th Floor
New York, New York 10016
Telephone: (212) 661-1100
Email: jalieberman@pomlaw.com
ahood@pomlaw.com

Patrick V. Dahlstrom
10 South La Salle Street, Suite 3505
Chicago, Illinois 60603
Telephone: (312) 377-1181
Email: pdahlstrom@pomlaw.com

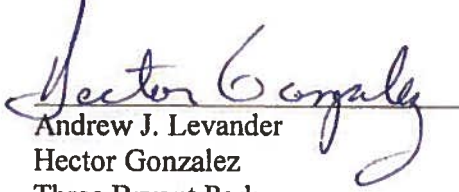
Attorneys for Plaintiff Gene Samit

WILLKIE FARR & GALLAGHER LLP

Mary Eaton
Alexander L. Cheney
Zeh S. Ekono
787 Seventh Avenue
New York, New York 10019
Telephone: (212) 728-8000
Email: meaton@willkie.com
acheney@willkie.com
zekono@willkie.com

*Attorneys for Defendants CBS Corporation
and Joseph R. Ianniello*

DECHERT LLP



Andrew J. Levander
Hector Gonzalez
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036
Telephone: (212) 698-3500
Email: andrew.levander@dechert.com
hector.gonzalez@dechert.com

Attorneys for Defendant Leslie Moonves

IT IS SO ORDERED:

The Honorable Valerie E. Caproni
United States District Judge

Dated: _____, 2018